



ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

• NJD0002456242

BENJAMIN BOORH & CO
134 LISTER AVE
NEWARK

NJ 07105

INSTALLATION ADDRESS

134 LISTER AVE
NEWARK

NJ 07105



ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

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EPA I.D. NUMBER

7JD002456242

INSTALLATION ADDRESS

BENJAMIN MOORE & CO
134 LISTER AVE
NEWARK

NJ 07105

134 LISTER AVE
NEWARK

NJ 07105

U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

INSTALLATION'S EPA I.D. NO.

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

Moore, Benjamin & Co.
134 Lister Ave.
Newark, N. J. 07105134 Lister Ave.
Newark, N. J. 07105

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER

APPROVED

DATE RECEIVED
(yr., mo., & day)

F N J D 0 0 2 4 5 6 2 4 2 2 1

8 0 0 8 0 8

I. NAME OF INSTALLATION

BENJAMIN MOORE & CO

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

3 1 3 4 L I S T E R A V E

CITY OR TOWN

4 N E W A R K

ST.

ZIP CODE

N J 0 7 1 0 5

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

5 1 3 4 L I S T E R A V E

CITY OR TOWN

6 N E W A R K

ST.

ZIP CODE

N J 0 7 1 0 5

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

PHONE NO. (area code & no.)

2 C A R U S O J O H N P L A N T S U P T

2 0 1 3 4 4 1 2 0 0

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8 B E N J A M I N M O O R E & C O

B. TYPE OF OWNERSHIP
(enter the appropriate letter into box)

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

F = FEDERAL
M = NON-FEDERAL

M

☒ A. GENERATION☒ B. TRANSPORTATION (complete item VII)☒ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☒ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION☐ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

FOR OFFICIAL USE ONLY															
5	W	N	J	D	0	0	2	4	5	6	2	4	2	T/A	C
1	2											13	14	15	

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
K078	K079	K081	K082		
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
19	20	21	22	23	24
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
25	26	27	28	29	30
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
37	38	39	40	41	42
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	48
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE
(D001)

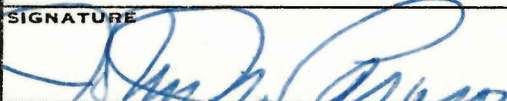
☐ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☒ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE


NAME & OFFICIAL TITLE (type or print)
JOHN CARUSO
PLANT SUPT.

DATE SIGNED
7/25/10

okay

FORM 1 GENERAL		U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program (Read the "General Instructions" before starting.)		I. EPA I.D. NUMBER NJ D002456242	
LABEL ITEMS		PLEASE PLACE LABEL IN THIS SPACE		GENERAL INSTRUCTIONS	
I. EPA I.D. NUMBER				If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.	
III. FACILITY NAME					
V. FACILITY MAILING ADDRESS					
VI. FACILITY LOCATION		II. POLLUTANT CHARACTERISTICS			
INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.					
SPECIFIC QUESTIONS		MARK 'X'		SPECIFIC QUESTIONS	
		YES	NO	FORM ATTACHED	
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)			X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)			X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)		X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)			X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)			X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)
III. NAME OF FACILITY					
1 SKIP BENJAMIN MOORE & CO.					
IV. FACILITY CONTACT					
A. NAME & TITLE (last, first, & title)			B. PHONE (area code & no.)		
2 CARUSO JOHN-PLANT SUPT			201 344 1200		
V. FACILITY MAILING ADDRESS					
A. STREET OR P.O. BOX					
3 134 LISTER AVE					
B. CITY OR TOWN			C. STATE D. ZIP CODE		
4 NEWARK			NJ 07105		
VI. FACILITY LOCATION					
A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER					
5 134 LISTER AVE					
B. COUNTY NAME					
ESSEX COUNTY					
C. CITY OR TOWN			D. STATE E. ZIP CODE F. COUNTY CODE (if known)		
6 NEWARK			NJ 07105		

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST										B. SECOND													
C	7	28	51	(specify)						C	7	(specify)											
15	16	-	19	PAINT MANUFACTURING										15	16	-	19						
C. THIRD										D. FOURTH													
C	7	(specify)								C	7	(specify)											
15	16	-	19											15	16	-	19						

VIII. OPERATOR INFORMATION

A. NAME																														B. Is the name listed in Item VIII-A also the owner?				
C	8	BENJAMIN MOORE & CO.																												<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO				
15	16																													66				

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)															D. PHONE (area code & no.)									
F = FEDERAL M = PUBLIC (other than federal or state) S = STATE O = OTHER (specify)															P (specify)									
P															C 201 344 1200 A 15 16 - 18 19 - 21 22 - 23									

E. STREET OR P.O. BOX																													
134 LISTER AVE																													
26 55																													

F. CITY OR TOWN															G. STATE					H. ZIP CODE					IX. INDIAN LAND				
C	B	NEWARK													NJ					07105					Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO				
15	16														40 41 42					47 - 51					52				

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)															D. PSD (Air Emissions from Proposed Sources)																
C	T	I													C	T	I														
9	N														9	P															
15	16	17	18	30												15	16	17	18	30											
B. UIC (Underground Injection of Fluids)															E. OTHER (specify)																
C	T	I													C	T	I	(specify)													
9	U														9																
15	16	17	18	30												15	16	17	18	30											
C. RCRA (Hazardous Wastes)															E. OTHER (specify)																
C	T	I													C	T	I	(specify)													
9	R														9																
15	16	17	18	30												15	16	17	18	30											

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

MANUFACTURE OF CONSUMER PAINTS AND VARNISHES

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)															B. SIGNATURE															C. DATE SIGNED									
RALPH W. LETTIERI EXEC. VICE PRES.															Ralph W. Lettieri															11/10/80									

COMMENTS FOR OFFICIAL USE ONLY

C																													
C																													
15	16																												

FORM
3
RCRA



U.S. ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

NSD002456242

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)
23	24

COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☒ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

☐ 2. NEW FACILITY (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION (place an "X" below and complete Item I above)

☐ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS

Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

Treatment:

TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
	T04	GALLONS PER DAY OR LITERS PER DAY

OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)				1. AMOUNT	2. UNIT OF MEASURE (enter code)	
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 1	16,500,000	G		7				
2	S 0 2	119,000,000	G		8				
3					9				
4					10				

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE
POUNDS P
TONS T

METRIC UNIT OF MEASURE CODE
KILOGRAMS K
METRIC TONS M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY												
W NJD00245624231													W DUP 32 DUP												
1 2 13 14 15													1 2 13 14 15 23 24 25												
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																									
WASTE NO. (enter code)	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																					
				1. PROCESS CODES (enter)																					
				2. PROCESS DESCRIPTION (if a code is not entered in D(1))																					
1	K078	225,000000	P	S01	S02																				
2	K079	999999999	P	S01	S02																				
3	K081	1000	P	S01																					
4	K082	10000	P	S01																					
5	D001	9000	P	S01																					
6	D005	13,500000	P	S01																					
7	D006		P	S01																					INCLUDED WITH ABOVE
8	D008		P	S01																					INCLUDED WITH ABOVE
9																									
10																									
11																									
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25																									
26																									

IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

F N J D 0 0 2 4 5 6 2 4 2 3 6

F6: $\frac{A}{55}$ F6: $\frac{A}{56}$

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

40 44 240

LONGITUDE (degrees, minutes, & seconds)

074 08 000

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII of Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII of Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

RALPH W. LETTIERI
EXEC. VICE PRES.

B. SIGNATURE

Ralph W. Lettieri

C. DATE SIGNED

11/10/80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

PLANT LOCATION: 40°44'2" North
74°08'0" West

NJD002Y56242

74°07'30"

40°45'



SCALE 1:24,000

USGS MAP ELIZABETH, NJ-NY

LOCATION MAP
BENJAMIN MOORE & CO.
134 LISTER AVENUE
NEWARK, NEW JERSEY

Benjamin Moore & Co.
Newark Operations

Quonset Hut
Open Drum Site
PRODUCT FINISHES SOLVENT STORAGE
OIL STORAGE
TANK FARM 1
TANK FARM 4
SOLVENT STORAGE
CAUSTIC CLEANING SHED 7-A
SHIPPING
BOILER RM.
REFUSE SHED

Handwritten notes in yellow boxes:

- 3rd Floor Bldg 1
9-1000 Gallon Tanks
Water Waste [Recycling]
- Bldg 4
1-10000 Gallon Tank
Water Waste [Dispose]
- 1-10000
2-5000
Solvent + Fuel
Recycling
- 4-20000 Gal
Solvent + Fuel
Recycling
- Liquid Solvent
+ Sludge Drum
Storage

3rd Floor Bldg 1
9-1000 Gallon Tanks
Water Waste [Recycling]

Liquid Solvent
+ Sludge Drum
Storage

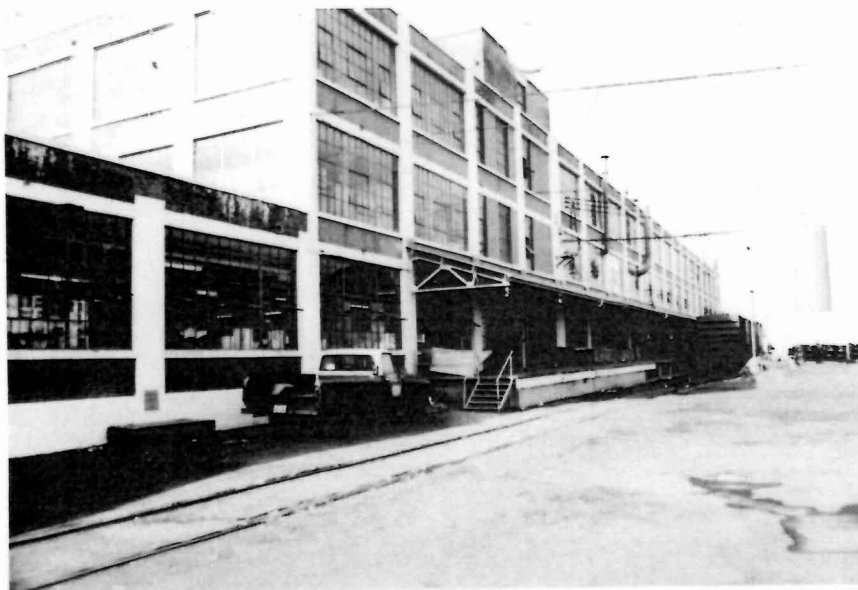
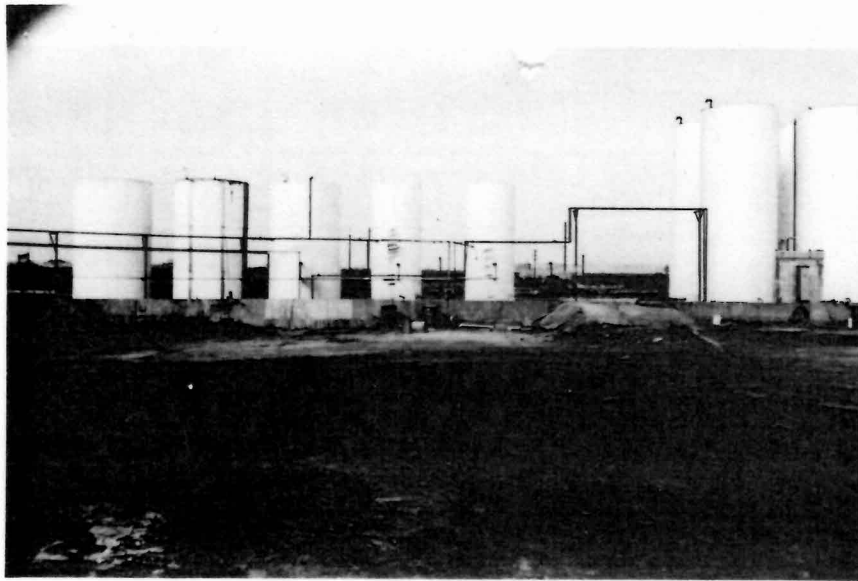
Solvent-Free Recycling

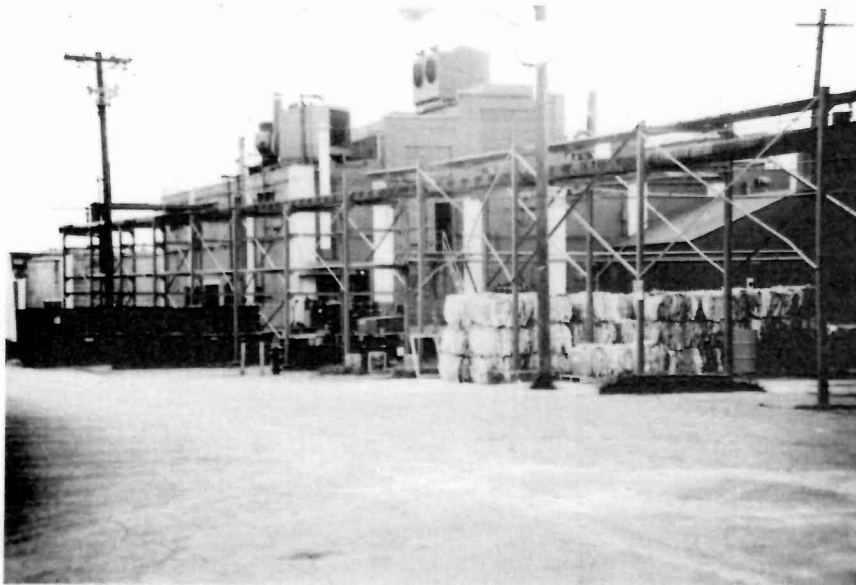
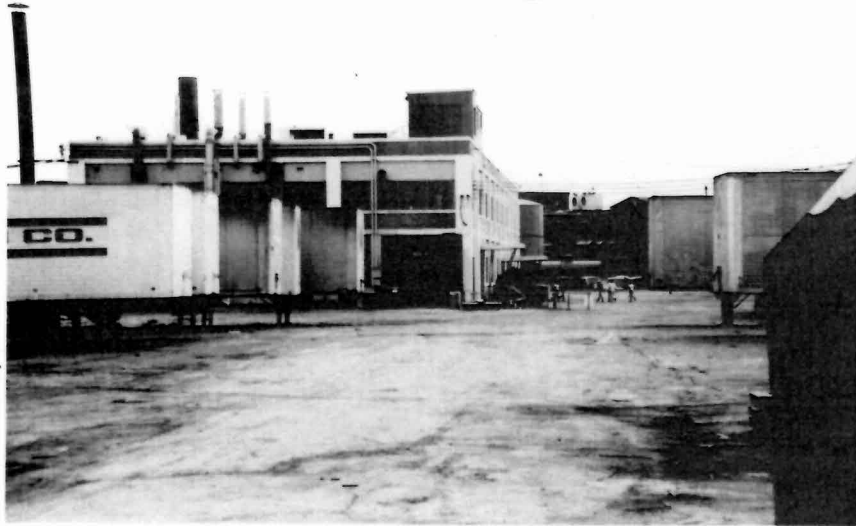
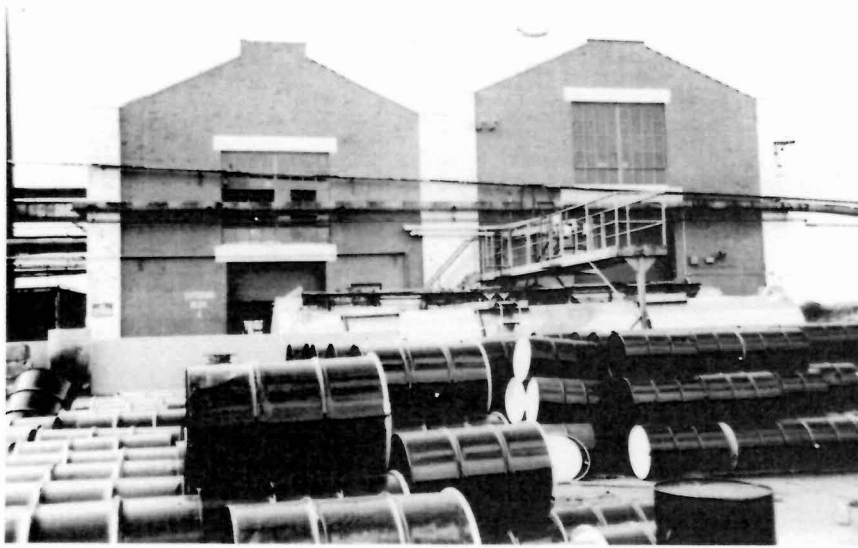
Bldg 4
1-10,000 Gallon Tank
Water Waste [Disposal]

Solvent
Fuel

1-10-0000
1-2-5000

4-2000G







most of which were unlabeled and appeared to be on site for long periods of time. Some drums had contents that Benjamin Moore employees could not identify. A leaking drum was noted and several drums in danger of leaking (badly rusted) and uncapped were noted. All drums were stored on pallets over asphalt in a parking lot section of the facility. A spill of a brown smi-liquid ^{20' x 15'} was noted in the drum storage area. Some caustic drums were labeled (approx. 80) and were dated 1/2/81. An additional 230 drums of mixed latex and alkyd resin sludge were noted. These drums were unlabeled. These drums are supposed to be reused by Moore.

Spillage of grey paint at the base of reclaimed solvent tanks on soil was noted. General housekeeping was fair and definitely could be improved. Benjamin Moore could not give an estimated date for cleanup and removal of the drums.

DEP contact: Ali Chaudhry (609) 633-7214

Conv., 3/25: Benjamin Moore was granted a
recycling exemption on its tanks.

1 tank(?)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JAN 7 1987

Benjamin Moore & Company
134 Lister Avenue
Newark, New Jersey 07105

NJD002456242

Gentlemen:

We have received your letter dated December 15, 1986, concerning reclassification for your two facilities, Benjamin Moore and Technical Coatings Co. Since the New Jersey Department of Environmental Protection has been authorized to make determinations regarding the regulatory status of hazardous waste handlers in their state, we are updating our records to reflect the decisions in their letters of July 27, 1983 and December 8, 1986.

If you have any question regarding this letter, please contact Susan Pepitone of my staff at (212) 264-9880.

Sincerely,

Laura J. Livingston, Chief
Water and Hazardous Waste Compliance Section
Permits Administration Branch

2PM-PA:PEPITONE:eh X9880:1-7-86

LEX 111

CONCURRENCES							
SYMBOL	2PM-PA	2PM-PA					
SURNAME	PEPITONE	LIVINGSTON					
DATE	1/7/87	1/7/87					

Need
Chamber with
502, 10000 gal (S&C)
C10 2/10/86



Closure Plan Approval

C1105 = WD
C119 = \$
C1103 = \$
C305 = \$

Done
S.P.

file

State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT
32 E. Hanover St., CN 028, Trenton, N.J. 08625

DR. MARWAN M. SADAT, P.E.
DIRECTOR

RICHARD C. SALKIE, P.E.
ASSOCIATE DIRECTOR

Carl B. Minchew, Plant Manager
Benjamin Moore & Co.
134 Lister Avenue
Newark, New Jersey 07105

10 FEB 1986

RE: Approval of Hazardous Waste Storage Tank Closure Plans for
Benjamin Moore & Co., Newark
EPA ID NO. NJD002456242

Dear Mr. Minchew:

The Bureau of Hazardous Waste Engineering (the Bureau) has completed a review of the closure plans for hazardous waste storage tank for the above referenced facility dated July 3, 1985. The New Jersey Department of Environmental Protection (NJDEP) finds the plans in compliance with the criteria set forth in subchapter 9 of N.J.A.C. 7:26.

Benjamin Moore & Co. is hereby authorized to close the subject 10,000 gallon hazardous waste storage tank as follows:

- (1) Remove all hazardous waste from the storage tank and manifest off-site to an authorized hazardous waste facility.
- (2) The tank and any associated equipment shall be thoroughly washed with clean solvent.
- (3) The tank surface and any surrounding surface which may have come in contact with hazardous waste shall be cleaned by sandblasting or equivalent means to remove all residues of hazardous waste.
- (4) All sandblasting residues as well as any waste wash solvents from the above operations shall be collected and manifested off-site to an authorized hazardous waste facility.

10 FEB 1986

- (5) Closure activities shall be completed within 180 days of the date of this approval.
- (6) Within thirty (30) days after the closure is completed, the owner or operator shall submit to the NJDEP certification both by the owner or operator and by an independent registered professional engineer that the contamination area has been closed in accordance with the specifications in the approved closure plan.

Should you have any questions on this matter, please contact Ali Chaudhry of my staff at (609) 633-2970.

Very truly yours,



Edward J. Londres, P.E.
Assistant Director
Engineering, Permits &
Licensing

EP11:ekp

c: Angel Chang, USEPA, Region II
David Shotwell, BCE



File

Benjamin Moore & Co.

PAINTS • VARNISHES • ENAMELS

134 LISTER AVENUE

MONTVALE
NEW YORK
NEWARK
BOSTON
RICHMOND
JACKSONVILLE

CHICAGO
ST. LOUIS
CLEVELAND
HOUSTON

DENVER
LOS ANGELES
SANTA CLARA
TORONTO
MONTREAL
VANCOUVER

NEWARK, NEW JERSEY 07105

CENTRAL LABORATORIES

December 15, 1986

*Sue for HUDAS and
purpose being written
confirmation to
pay.*

C119 = # ✓
C1105 = PE ✓
C1103 = # ✓

Comments: 09 ✓
C305 = # ✓

Ms. Laura Livingston
c/o Permits Administration Branch
USEPA Region II
26 Federal Plaza
New York, New York 10278

Dear Ms. Livingston:

After speaking to Mr. Bill Halpert on December 11th, 1986, I am writing you on his advice concerning Federal EPA confirmation of the withdrawal of our New Jersey plants' RCRA Part A Permits and reclassification to "generator only" status.

On November 10th, 1980, we filed protectively Part A RCRA permits as Generators, Transporters and Treaters, Storers and Disposers of Hazardous Waste at the following two plants:

Benjamin Moore & Co.
134 Lister Ave.
Newark, N.J. 07105
EPA # NJD002456242

and

NJD091511254
Technical Coatings Co. →
57 E. Centre St.
Nutley, N.J. 07110

(A wholly own subsidiary of Benjamin Moore & Co.)

C119 = # ✓
C1105 = PE ✓
C305 = # ✓

When in 1983, it became clear we were in fact generators only of hazardous waste (storing only for 90 days or less and not treating, disposing or transporting) we requested from USEPA Region II and New Jersey DEP withdrawal of our part A's and reclassification to "generator only" status.

(cont'd.)

(2)

On July 25th, 1983, we received New Jersey DEP reclassification for the Technical Coatings Co., Nutley plant and now on December 8th, 1986 for the Benjamin Moore & Co., Newark plant. Copies of the letters are enclosed.

We now respectfully request written confirmation from USEPA Region II of your agreement to these Part A withdrawals and status reclassifications.

Very truly yours,

BENJAMIN MOORE & CO.

A handwritten signature in dark ink, appearing to read "B. A. Jenkin", with a long, sweeping horizontal stroke extending to the right.

Barry A. Jenkin
201-344-1200-ext. 257

BAJ:mak
enc.



State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT

John J. Trela, Ph.D., Acting Director
CN 028
Trenton, N.J. 08625
609 - 292 - 1250

Lawrence N. Berg
Benjamin Moore and Company
134 Lister Avenue
Newark, NJ 07105

DEC 1986

Copy - B Jenkin

Dear Mr. Berg:

RE: Operating Status of Benjamin Moore and Company,
EPA ID No. NJD 002 456 242

The Bureau of Hazardous Waste Engineering (the bureau) has completed a review of Benjamin Moore and Company's (the facility) submittals dated January 21, 1985 relating to Hazardous Waste Recycling Exemption Requirements, March 19, 1986, reporting the closure of a 10,000 gallon storage tank (S02), April 25, 1986 concerning your accumulation of hazardous waste for less than ninety (90) days, and August 8, 1986, revisions concerning container storage procedures, training of employees, preparedness and prevention, and contingency emergency procedures.

Previously the facility had been listed as a TSD facility because the facility originally filed a Part A permit application with the USEPA on November 10, 1980 for S01 drum storage of 16,500 gallons of hazardous waste and S02 tank storage of 92,000 gallons of hazardous waste. Upon review of the aforementioned submittals, the bureau has reached the following conclusions regarding present hazardous waste activity at the above referenced facility:

1. Two (2) 10,000 gallon storage tanks inside the building and four (4) 20,000 gallon storage tanks, and two (2) 5,000 gallon storage tanks outside the building have been excluded from permitting requirements under N.J.A.C. 7:26-9.1(C) 10 as stated in the March 20, 1985 letter from Mr. Frank Coolick, then Chief, Bureau of Hazardous Waste Engineering.
2. One 10,000 gallon storage tank (S02) has been closed since March 13, 1986 and in accordance with the requirements of N.J.A.C. 7:26-9.8 the closure has been inspected by a New Jersey professional engineer.
3. The hazardous waste on the drum storage area (S01) will be disposed at an authorized facility within ninety (90) days.

8 DEC 1986

If the aforementioned conclusions are incorrect or incomplete, please contact this bureau immediately.

Assuming the aforementioned conclusions are correct, Benjamin Moore and Company's facility identified by the following USEPA identification number:

NJD 002 456 242

is excluded from applicable hazardous waste treatment, storage or disposal regulations under N.J.A.C. 7:26-1 et seq. based on the following:

1. On-site generated hazardous waste drum storage is in accordance with N.J.A.C. 7:26-9.3.
2. On-site generated hazardous waste is not stored in tanks.

This written acknowledgement of the exclusion of the facility from the New Jersey Department of Environmental Protection's (NJDEP) list of existing hazardous waste TSD facilities is based expressly on the review of the aforementioned correspondence. This letter makes no claim as to extent and physical conditions of the actual hazardous waste activities occurring at the site mentioned above.

The issuance of this delisting letter by the Department does not indicate or imply, and should not be construed as a waiver of any requirements pursuant to the New Jersey Water Pollution Control Act, N.J.S.A. 58:10A-1 et seq. If your facility is in any of the regulated categories identified in the above cited regulations, you are hereby directed to apply for any and all permits necessary within ninety (90) days to the Bureau of Ground Water Quality Management, CN 029, Trenton, NJ, 08625. Applications may be obtained by calling (609) 292-0424.

Benjamin Moore and Company's facility is no longer included in the NJDEP's list of "existing facilities" (see N.J.A.C. 7:26-1.4 and 12.3) and therefore does not need to conform with the interim operating requirements of N.J.A.C. 7:26-9 et seq. for "existing facilities" which would include the Hazardous Waste Facility Annual Report. It is the facility's responsibility to operate within the conditions listed above. To operate a hazardous waste facility without prior approval from the NJDEP is a violation of the Solid Waste Management Act N.J.S.A. 13:1e-1 et seq.

If you have any questions on these matters, please contact Mr. Daniel Menniti of my staff at (609) 633-0730.

Very truly yours,



Ernest J. Kuhlwein, Jr., Acting Chief
Bureau of Hazardous Waste Engineering

EP58/abl

c: Angel Chang

STATE OF New Jersey)
COUNTY OF Essex) ss.:

Edward A. Lee
NOTARY PUBLIC
EDWARD A. LEE
NOTARY PUBLIC OF NEW JERSEY
BY COMMISSION EXPIRED AUG. 7, 1969



Benjamin Moore & Co.

PAINTS • VARNISHES • ENAMELS

MONTVALE
NEW YORK
NEWARK
BOSTON
RICHMOND
JACKSONVILLE

CHICAGO
ST. LOUIS
CLEVELAND
HOUSTON

DENVER
LOS ANGELES
SANTA CLARA
TORONTO
MONTREAL
VANCOUVER

Walke

134 LISTER AVENUE

NEWARK, NEW JERSEY 07105

February 19, 1985

Mr. Conrad Simon, Director
Air and Waste Management Division
U. S. Environmental Protection
Agency, Region II
26 Federal Plaza
New York, New York 10278

Re: Request for Information
Benjamin Moore & Company
EPA ID. No. NJD002456242

Dear Mr. Simon:

We are in receipt of your February 5 request for information and a "Certification of Answers.." received February 15, 1985. The following items are enclosed in response to your request:

1) Closure Plan

This facility's Closure Plan is part of our "Hazardous Waste Management Procedures." The plan includes maximum quantities to be disposed as well as contractors and estimated cost of disposal. Since all Hazardous Waste will be removed from the site and all equipment and holding tanks decontaminated, no Post Closure monitoring will be required.

2) EPA ID. No.

The EPA ID. No. for this facility is NJD002456242. A copy of our Acknowledgement of Notification of Hazardous Waste Activity is enclosed.

NEWARK, NJ
FEB 22 2 00 PM '85
AIR & WASTE DIVISION

Mr. Conrad Simon, Director

-2-

February 19, 1985

3) Financial Assurance

We have enclosed our most recent Financial Assurance Report and the official acceptance of that report by the New Jersey Department of Environmental Protection.

4) Certification of Answers

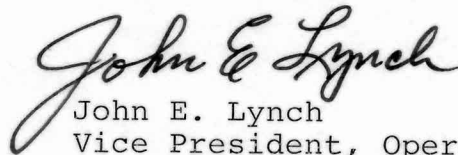
As requested the "Certification of Answers..." has been notarized and included with this submittal.

In closing, we wish to advise the agency that we have filed with the New Jersey Department of Environmental Protection for delisting of our plant from Treatment Storage and Disposal facility status to "generator only" status. We believe we have satisfied all of the department's requirement and the request is pending at this time.

We trust these enclosures will fulfill your request. If any clarification or follow-up is required please contact Carl Minchew at (201) 344-1200.

Very truly yours,

BENJAMIN MOORE & CO.


John E. Lynch

Vice President, Operations

JEL:nt
Enclosures

Benjamin Moore & Co.
134 Lister Avenue
Newark, New Jersey 07105

Waste Storage Closure Plan

a. Upon closure of the storage operation the following approximate bulk storage inventories would be on hand:

1. Liquid Solvent Waste (Mineral Spirits Type)
30,000 gallons. (6 Tanker Wagon Loads)
2. Sludge From #1
10,000 gallons. (200 Drums and 3 Trailer Loads)
3. Dollar Cost: (Current rates .15/gallon liquid,
plus \$100 Transportation; \$40/drum
sludge, plus \$1600 Transportation)

\$4,500 - Liquid Removal
\$6,000 - Transportation
\$8,000 - Sludge Removal
\$4,800 - Transportation
\$17,900 - Removal of contents from Liquid
Solvent Waste, Bulk Storage Facility.

4. Liquid Water Waste

15,000 gallons (3 Tank Wagon Loads)

5. Sludge From #4

3,000 gallons (60 Drums and 1 Trailer Load)

6. Dollar Cost (Current rates .28/gallon liquid,
plus \$100 Transportation; \$40 drum
sludge plus \$1,600 Transportation.

\$4,200 Liquid Removal
\$300 Transportation
\$2,400 Sludge Removal
\$1,600 Transportation
\$8,000 Removal of Contents from Liquid Water
Waste, Bulk Storage Facility.

Water Storage Closure Plan (cont'd)

b. The disposal facilities, and haulers involved with a.1-6 above are as follows:

1. SCA Chemical Services Co., Earthline
Division EPA I.D. Number NJD 089216790
2. E.I. DuPont DeNemours and Co.
EPA I.D. Number NJD 02385730
3. HWD Inc.
EPA I.D. Number NYT000603894
4. S.C.D.H.E.C.
EDA I.D. Number SCD070375985

c. Upon closure of the storage operation the following approximate drum storage inventories would be on hand:

1. Sludge Waste, Solvent Type
30 Drums
2. Sludge Waste, Water Type
30 Drums
3. Dollar Cost: (Current rates \$40/drum, plus
\$1600 Transportation)

\$2,400 Sludge Removal
\$1,600 Transportation
\$4,000 Removal of sludge and containers
from Drum Storage Facility.

d. The disposal facility, and hauler involved with c.1-3 above, is as follows:

1. S.C.D.H.E.C.
EPA I.D. Number SCD070375985
2. Benjamin Moore & Co. Transportation
Department.
EPA I.D. Number NJD002456242

e. All evacuated holding tanks will be maintained as-is, within the present property location at 134 Lister Avenue, Newark, New Jersey 07105

LETTER FROM CHIEF FINANCIAL OFFICER

(To demonstrate liability coverage and/or to demonstrate
both liability coverage and assurance of closure
and/or post-closure care.)

Director
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

Dear Sir or Madam:

I am the chief financial officer of BENJAMIN MOORE & CO. 51 Chestnut Ridge Rd., Montvale NJ 07645

This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure
and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265 and/or Subpart H of 35 Illinois
Administrative Code Parts 724 and 725.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265 and/or tests equivalent or substantially equivalent, and/or Subpart H of 35 Illinois Administrative Code Parts 724 and 725:

USEPA I.D. No. MADO-01065911

Name Benjamin Moore & Co.

Address 49 Sumner Street, Milford, MA 01757

Please attach a separate page if more space is needed for all facilities.

See Instruction (4)

1. This firm is the owner or operator of the following facilities for which financial assurance for closure and/or post-closure care is demonstrated through the financial test specified in Subpart H of 35 Ill. Adm. Code Parts 724 and 725. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: (LIST ALL THE ILLINOIS FACILITIES USING THE FINANCIAL TEST)

USEPA I.D. No. <u>ILDO-05457155</u> (5)	Closure Amount (6)	Post-Closure Amount (7)	Closure and Post-Closure Amounts (8)
Name <u>Benjamin Moore & Co.</u>			
Address <u>North and 25th Avenues</u>	<u>\$3,000</u>	<u>Not</u>	<u>\$3,000</u>
City <u>Melrose Park, IL 60160</u>		<u>Applicable</u>	

USEPA I.D. No. _____

Name _____

Address _____

City _____

Please attach a separate page if more space is needed for all facilities.

2. This firm guarantees, through the corporate guarantee specified in Subpart H of 35 Ill. Adm. Code Parts 724 and 725, the closure and/or post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for closure and/or post-closure care so guaranteed are shown for each facility: (LIST ALL THE ILLINOIS FACILITIES USING THE CORPORATE GUARANTEE)

USEPA I.D. No. ILDO-59430561

(5)

Closure
Amount

(6)

Post-Closure
Amount

(7)

Closure and
Post-Closure
Amounts

(8)

Name Technical Coatings Co.

Address North and 25th Avenues

City Melrose Park, IL 60160

Not Applicable - Generator Only

USEPA I.D. No. _____

Name _____

Address _____

City _____

Please attach a separate page if more space is needed for all facilities.

3. For states other than Illinois this owner or operator or guarantor is demonstrating financial assurance for the closure or post-closure care of the following facility through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility: (LIST ALL FACILITIES WHICH ARE NOT IN ILLINOIS BUT ARE SUBJECT TO A STATE OR FEDERAL FINANCIAL ASSURANCE REQUIREMENT THAT ARE ASSURED BY A FINANCIAL TEST OR CORPORATE GUARANTEE)

USEPA I.D. No. MADO-01065911

(5)

Closure
Amount

(6)

Post-Closure
Amount

(7)

Closure and
Post-Closure
Amounts

(8)

Name Benjamin Moore & Co.

Not

Address 49 Sumner Street

\$6,900

Applicable

\$6,900

City Milford, MA 01757

USEPA I.D. No. NJDO-02456242

Name Benjamin Moore & Co.

Not

Address 134 Lister Avenue

\$29,900

Applicable

\$29,900

City Newark, NJ 07105

Please attach a separate page if more space is needed for all facilities.

4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is *NOT* demonstrated either to IEPA, USEPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent state mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: (LIST FACILITIES IN RCRA AUTHORIZED STATES WHERE THERE IS NO STATE FINANCIAL ASSURANCE REQUIREMENT)

USEPA I.D. No. _____

(5)

Closure
Amount

(6)

Post-Closure
Amount

(7)

Closure and
Post-Closure
Amounts

(8)

Name NONE

Address _____

City _____

NJDO-02456242
Benjamin Moore & Co.
134 Lister Avenue
Newark, NJ 07105

CODO-07068372
Benjamin Moore & Co.
2500 Walnut Street
Denver, CO 80205

CADO-09118506
Technical Coatings Co.
1056 Walsh Avenue
Santa Clara, CA 95050

CADO-08314932
Benjamin Moore & Co.
3325 S. Garfield Avenue
Los Angeles, CA 90040

ILDO-05457155
Benjamin Moore & Co.
North and 25th Avenues
Melrose Park, IL 60160

OHDO-04219929
Benjamin Moore & Co.
4400 East 71st Street
Cleveland, OH 44105

MOD0-06290258
Benjamin Moore & Co.
1630 S. Second Street
St. Louis, MO 63157

OHDO-04219929
Benjamin Moore & Co.
4400 East 71st Street
Cleveland, OH 44105

Closure Cost Estimate \$5,000

Post-Closure Care Cost
Estimate Not Applicable

MOD0-06290258
Benjamin Moore & Co.
1630 S. Second Street
St. Louis, MO 63157

Closure Cost Estimate \$5,000

Post-Closure Care Cost
Estimate Not Applicable

CODO-07068372
Benjamin Moore & Co.
2500 Walnut Street
Denver, CO 80205

Closure Cost Estimate \$5,000

Post-Closure Care Cost
Estimate Not Applicable

CADO-08314932
Benjamin Moore & Co.
3325 S. Garfield Avenue
Los Angeles, CA 90040

Closure Cost Estimate \$9,352

Post-Closure Care Cost
Estimate Not Applicable

CADO-09118506
Technical Coatings Co.
1056 Walsh Avenue
Santa Clara, CA 95050

Closure Cost Estimate \$4,500

Post-Closure Care Cost
Estimate Not Applicable

Part B. Closure or Post-Closure Care and Liability Coverage (See Instructions 14 and 15)

Alternative I

1. Sum of current closure and post-closure cost estimates (total of all cost estimates listed above)	\$ 68,652
2. Amount of annual aggregate liability coverage to be demonstrated	\$ 2,000,000
3. Sum of lines 1 and 2	\$ 2,068 652
*4. Total liabilities (if any portion of your closure or post-closure cost estimates is included in your total liabilities, you may deduct that portion from this line and add that amount to lines 5 and 6)	\$ 27,474,172
*5. Tangible net worth	\$ 86,586,152
*6. Net worth	\$ 86,668,534
*7. Current assets	\$ 92,073,942
*8. Current liabilities	\$ 23,192,796
9. Net working capital (line 7 minus line 8)	\$ 68,881,146
*10. The sum of net income plus depreciation, depletion, and amortization	\$ 20,667,289
*11. Total assets in U.S. (required only if less than 90% of assets are located in the U.S.)	\$ 100,271,083
	Yes No
12. Is line 5 at least \$10 million?	X /
13. Is line 5 at least 6 times line 3?	X /
14. Is line 9 at least 6 times line 3?	X /
*15. Are at least 90% of assets located in the U.S.? If not, complete line 16.	/ X
16. Is line 11 at least 6 times line 3?	X /
17. Is line 4 divided by line 6 less than 2.0?	X /
18. Is line 10 divided by line 4 greater than 0.1?	X /
19. Is line 7 divided by line 8 greater than 1.5?	X /

Signature

W. J. Fritz

Typed name

W. J. Fritz

Title

Vice President - Controller

Date

March 23, 1984

Part B. Closure or Post-Closure Care and Liability Coverage (See Instructions 14 and 15)

Alternative II

1. Sum or current closure and post-closure cost estimates (total of all cost estimates listed above) \$ _____
2. Amount of annual aggregate liability coverage to be demonstrated \$ _____
3. Sum of lines 1 and 2 \$ _____
4. Current bond rating of most recent issuance and name of rating service _____
5. Date of issuance of bond _____
6. Date of maturity of bond _____
- *7. Tangible net worth (if any portion of the closure or post-closure cost estimates is included in "total liabilities" on your financial statements you may add that portion to this line) \$ _____
- *8. Total assets in the U.S. (required only if less than 90% of assets are located in the U.S.) \$ _____
- | | Yes | No |
|--|---------------|---------------|
| 9. Is line 7 at least \$10 million? | _____ / _____ | _____ / _____ |
| 10. Is line 7 at least 6 times line 3? | _____ / _____ | _____ / _____ |
| *11. Are at least 90% of assets located in the U.S.? | _____ / _____ | _____ / _____ |
| If not, complete line 12. | | |
| 12. Is line 8 at least 6 times line 3? | _____ / _____ | _____ / _____ |

Signature

Typed name

Title

Date

USEPA I.D. No. _____

Name _____

Address _____

City _____

Please attach a separate page if more space is needed for all facilities.

This owner or operator _____ is _____ to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest
(9)
fiscal year.

The fiscal year of this owner or operator ends on December 31 *. The figures for the following items marked with an asterisk
(10)
are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year, ended
December 31, 1983.

(11)

Part A. Liability Coverage for Accidental Occurrences (See Instruction 12 and (13))

Alternative I

1. Amount of annual aggregate liability coverage to be demonstrated \$ _____
 - *2. Current assets \$ _____
 - *3. Current liabilities \$ _____
 4. Net working capital (line 2 minus line 3) \$ _____
 - *5. Tangible net worth \$ _____
 - *6. If less than 90% of assets are located in the U.S., give total U.S. assets \$ _____
- | | Yes | No |
|--|-----|----|
| 7. Is line 5 at least \$10 million? | / | / |
| 8. Is line 4 at least 6 times line 1? | / | / |
| 9. Is line 5 at least 6 times line 1? | / | / |
| *10. Are at least 90% of assets located in the U.S.? | / | / |
| If not, complete line 11. | | |
| 11. Is line 6 at least 6 times line 1? | / | / |

Signature _____

Typed name _____

Title _____

Date _____

Part A. Liability Coverage for Accidental Occurrences (See Instruction 12 and (13))

Alternative II

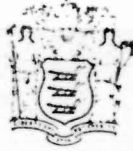
1. Amount of annual aggregate liability coverage to be demonstrated \$ _____
 2. Current bond rating of most recent issuance and name of rating service
 3. Date of issuance of bond
 4. Date of maturity of bond
 - *5. Tangible net worth \$ _____
 - *6. Total assets in U.S. (required only if less than 90% of assets are located in U.S.) \$ _____
- | | Yes | No |
|---|-----|----|
| 7. Is line 5 at least \$10 million? | / | / |
| 8. Is line 5 at least 6 times line 1? | / | / |
| *9. Are at least 90% of assets located in the U.S.? | / | / |
| If not, complete line 10. | | |
| 10. Is line 6 at least 6 times line 1? | / | / |

Signature _____

Typed name _____

Title _____

Date _____



State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT
32 E. Hanover St., CN 028, Trenton, N.J. 08625

DR. MARWAN M. SADAT, P.E.
DIRECTOR

19 APR 1984

LINO F. PEREIRA, P.E.
DEPUTY DIRECTOR

K. J. McClinton, Assistant Treasurer
Benjamin Moore & Co.
Chestnut Ridge Road
Montvale, NJ 07645

RE: Status of Hazardous Waste TSD Facility Financial Documents
for Benjamin Moore & Co., Newark, Essex County
EPA ID NO. NJD002456242


Dear Mr. McClinton:

The Bureau of Hazardous Waste Engineering (the Bureau) is in receipt of your letter dated March 23, 1984. The Bureau has reviewed your letter and status of financial documents for your above referenced TSD facility. The Surety Bond and Standby Trust Agreement are automatically renewed every year unless the financial institution notifies your company and the NJDEP, in writing, of its intention of cancellation of these documents. Your company's insurance policy is valid until 9/30/84 and should be renewed every year.

Therefore, the Bureau's record indicates that the Benjamin Moore & Co. Newark Plant is in compliance with the financial requirements of New Jersey Hazardous Waste Management Regulations, under N.J.A.C. 7:26-9.10 and 9.13.

If you have any questions relative to this matter, please contact Ali Chaudhry of my staff at (609) 633-7714.

Very truly yours,


Frank Coolick, Chief
Bureau of Hazardous Waste
Engineering

EP11/ch

cc. C. McClinton
B. Jenkins



Benjamin Moore & Co.

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MONTREAL
VANCOUVER

CHESTNUT RIDGE ROAD

MONTVALE, NEW JERSEY 07645

EXECUTIVE OFFICE

March 23, 1984

Mr. Frank Coolick, Chief
Bureau of Hazardous Waste Engineering
State of New Jersey
32 E. Hanover Street - CN 028
Trenton, NJ 08625

Re: Financial Documents - Benjamin Moore & Co. - Essex County - EPA I.D.
No. NJDOO2456242

Dear Mr. Coolick:

We enclose the 1984 R.C.R.A. financial assurance statements as required.

The insurance policies, appropriately endorsed, #SLP 6-07-50-56 issued by American National Fire Insurance Company and BE 1318008 issued by National Union Fire Insurance Company of Pittsburgh, PA, of which copies were submitted, are still in force covering the period 9/30/83 to 9/30/84.

The Seaboard Surety Company's bond #958614-83 was effective 10/15/83 and is permanent until cancelled with permission from D.E.P. Commissioner, N.J.D.E.P. The bond was also submitted with last year's filing.

The Standby Trust Agreement issued by United Jersey Bank and submitted with last year's filing is continuous until cancelled in writing by the D.E.P. Commissioner, N.J.D.E.P.

We hope these previous submissions can be relied upon as applicable to our current financial assurances submission.

If any other data is required, please let us hear from you.

Sincerely,

K. J. McClinton
Assistant Treasurer

KJM:new

Enclosures



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT

32 E. Hanover St., CN 027, Trenton, N.J. 08625

JACK STANTON
DIRECTOR

27 JUL 1983

LINO F. PEREIRA
DEPUTY DIRECTOR

Mr. Ted Chanowski
Technical Coatings Company
Eastern District
57 East Centre Street
Nutley, New Jersey 07110

RE: Hazardous Waste Facility Classification of:
Technical Coatings Company, Nutley, Essex County,
EPA ID NO. NJD041511254

Dear Mr. Chanowski:

The Bureau of Hazardous Waste Engineering is in receipt of your letter dated July 14, 1983 requesting that the referenced facility be reclassified from a hazardous waste treatment, storage or disposal (TSD) facility to "generator only" status.

As explained by you, it is the Bureau's understanding that the referenced facility has never used tanks to store hazardous waste and that the activity code (S02) indicating such on the company's original RCRA Part A application was done as a precautionary measure because of uncertainties at the time.

Consequently, this Bureau will delete the activity S02 (storage in tanks) from your company's Part A application of record, leaving only the activity S01 (storage in containers) remaining.

Additionally, as requested by your company, the Bureau hereby reclassifies your facility to listing solely as a generator, subject to compliance with the following requirements of N.J.A.C. 7:26-9.3:

1. All such waste is, within 90 days or less, shipped off-site to an authorized facility or placed in an on-site authorized facility, as defined at N.J.A.C. 7:26-1.4.
2. The waste is placed in containers which meet the standards of N.J.A.C. 7:26-7.2 and are managed in accordance with N.J.A.C. 7:26-9.4(d).
3. The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.

27 JUL 1983

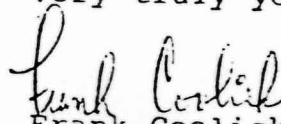
4. The generator complies with the requirements for owners and operators of N.J.A.C. 7:26-9.6 and 9.7 concerning preparedness and prevention, contingency plans and emergency procedures as well as N.J.A.C. 7:26-9.4(g) concerning personnel training.

This written acknowledgement of the delisting of the above identified facility from TSD facility status to generator status is based expressly on the review of the aforementioned correspondence. This letter makes no claim as to the extent and physical condition of the actual hazardous waste activities occurring at the site mentioned above.

Your company's hazardous waste facility above is no longer included in DEP's list of "existing facilities" (see N.J.A.C. 7:26-1.4 and 12.3) and therefore does not need to conform with the interim operating requirements of N.J.A.C. 7:26-1 et seq. for "existing facilities". It is the company's responsibility to operate within the conditions listed above. To operate a hazardous waste facility without prior approval from the DEP is a violation of the Solid Waste Management Act N.J.S.A. 13:1E-1 et seq.

If you have any questions on this matter, please call Mr. Walter Nedick of my staff at (609) 292-9880.

Very truly yours,


Frank Coolick, Chief
Bureau of Hazardous
Waste Engineering

FC:WN:jb

c: Joel Golumbek
USEPA, Region II

Dave Shotwell
DWM-BCE

Dr. Dave Leu
DWM-BHWC



Benjamin Moore & Co.

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MONTREAL
VANCOUVER

CHESTNUT RIDGE ROAD

MONTVALE, NEW JERSEY 07645

EXECUTIVE OFFICE

June 27, 1983

Mr. Joseph Civinar
E.P.A.
Grants Administration Branch
26 Federal Plaza
New York, New York 10278

Dear Mr. Civinar:

As per instructions from Mr. Gordon Kaplan of your office, we enclose the following documents under R.C.R.A.:

1. Revised letter from Chief Financial Officer,
2. Certificates of insurance, and
3. Copy of 1982 Annual Report to shareholders.

We trust this submission will be found to be in conformity with Region II requirements.

Thank you.

Sincerely,


K. J. McClinton
Assistant Treasurer

KJM:new

Enclosures

Our Centennial Year
1883-1983



Benjamin Moore & Co.

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VANCOUVER

CHESTNUT RIDGE ROAD

MONTVALE, NEW JERSEY 07645

EXECUTIVE OFFICE

April 4, 1983

Re: Letter from Chief Financial Officer (to demonstrate liability coverage or to demonstrate both liability coverage and assurance of closure or post-closure care)

Dear Sir/Madam:

I am the Chief Financial Officer of Benjamin Moore & Co., 51 Chestnut Ridge Road, Montvale, NJ 07645. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265.

MADO-01065911
Benjamin Moore & Co.
49 Sumner Street
Milford, MA 01757

ILDO-05457155
Benjamin Moore & Co.
North and 25th Avenues
Melrose Park, IL 60160

NJDO-02456242
Benjamin Moore & Co.
134 Lister Avenue
Newark, NJ 07105

OHDO-04219929
Benjamin Moore & Co.
4400 East 71st Street
Cleveland, OH 44105

VADO-42197772
Benjamin Moore & Co.
West Roslyn Road
Colonial Heights, VA 23834

MOD0-06290258
Benjamin Moore & Co.
1630 S. Second Street
St. Louis, MO 63157

CODO-07068372
Benjamin Moore & Co.
2500 Walnut Street
Denver, CO 80205

CADO-09118506
Technical Coatings Co.
1056 Walsh Avenue
Santa Clara, CA 95050

Our Centennial Year
1883-1983

April 4, 1983

CADO-08314932
Benjamin Moore & Co.
3325 S. Garfield Avenue
Los Angeles, CA 90040

ILDO-59430561
Technical Coatings Co.
North & 25th Avenues
Melrose Park, IL 60160

NJDO-41511254
Technical Coatings Co.
57 East Centre Street
Nutley, NJ 07110

1. The owner or operator identified above owns or operates the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H or 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

MADO-01065911
Benjamin Moore & Co.
49 Sumner Street
Milford, MA 01757

Closure Cost Estimate \$6,900

Post Closure Care Cost
Estimate Not Applicable

NJDO-02456242
Benjamin Moore & Co.
134 Lister Avenue
Newark, NJ 07105

Closure Cost Estimate \$29,900

Post-Closure Care Cost
Estimate Not Applicable

VADO-42197772
Benjamin Moore & Co.
West Roslyn Road
Colonial Heights, VA 23834

Closure Cost Estimate \$10,000

Post-Closure Care Cost
Estimate Not Applicable

ILDO-05457155
Benjamin Moore & Co.
North and 25th Avenues
Melrose Park, IL 60160

Closure Cost Estimate \$3,000

Post-Closure Care Cost
Estimate Not Applicable

OHDO-04219929
Benjamin Moore & Co.
4400 East 71st Street
Cleveland, OH 44105

Closure Cost Estimate \$5,000

Post-Closure Care Cost
Estimate Not Applicable

MODO-06290258
Benjamin Moore & Co.
1630 S. Second Street
St. Louis, MO 63157

Closure Cost Estimate \$5,000

Post-Closure Care Cost
Estimate Not Applicable

CODO-07068372
Benjamin Moore & Co.
2500 Walnut Street
Denver, CO 80205

Closure Cost Estimate \$4,723

Post-Closure Care Cost
Estimate Not Applicable

CADO-08314932
Benjamin Moore & Co.
3325 S. Garfield Avenue
Los Angeles, CA 90040

Closure Cost Estimate \$9,352
Post-Closure Care Cost
Estimate Not Applicable

2. The owner or operator identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure and post-closure care of the following facilities owned and operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility:

ILDO-59430561
Technical Coatings Co.
North & 25th Avenues
Melrose Park, IL 60160

Closure Cost Estimate \$3,400
Post-Closure Care Cost
Estimate Not Applicable

NJDO-41511254
Technical Coatings Co.
57 East Centre Street
Nutley, NJ 07110

Closure Cost Estimate \$3,840
Post-Closure Care Cost
Estimate Not Applicable

CADO-09118506
Technical Coatings Co.
1056 Walsh Avenue
Santa Clara, CA 95050

Closure Cost Estimate \$4,500
Post-Closure Care Cost
Estimate Not Applicable

3. In states where EPA is not administering the financial requirements of Subpart H or 40 CFR Parts 264 and 265, this owner or operator is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test are shown for each facility: NONE

4. The owner or operator identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a state through the financial test or any other financial assurance mechanism specified in Subpart H or 40 CFR Parts 264 and 265 or equivalent or substantially equivalent state mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: NONE

The owner or operator is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on December 31. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year ended December 31, 1982.

ALTERNATIVE I

1.	Sum of current closure and post-closure cost estimates (total of <u>all</u> cost estimates listed above)	85,615	
2.	Amount of annual aggregate liability coverage to be demonstrated	2,000,000	
3.	Sum of lines 1 and 2	2,085,615	
*4.	Total liabilities	24,060,983	
*5.	Tangible net worth	78,346,243	
*6.	Net Worth	78,579,379	
*7.	Current Assets	80,687,696	
*8.	Current Liabilities	19,755,343	
9.	Net Working Capital	60,932,353	
*10.	The sum of net income plus depreciation, depletion and amortization	15,015,503	
*11.	Total assets in the U.S. (required only if less than 90% of assets are located in the U.S.)	89,921,739	
		<u>YES</u>	<u>NO</u>
12.	Is line 5 at least \$10 Million?	X	
13.	Is line 5 at least 6 times line 3?	X	
14.	Is line 9 at least 6 times line 3?	X	
*15.	Are at least 90% of assets located in the U.S.? If not, complete line 16		X
16.	Is line 11 at least 6 times line 3?	X	
17.	Is line 4 divided by line 6 less than 2.0?	X	
18.	Is line 10 divided by line 4 greater than 0.1?	X	
19.	Is line 7 divided by line 8 greater than 1.5?	X	

* Covered by accountants report, all others not covered.

April 4, 1983

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151 (g) as such regulations were constituted on the date shown immediately below.

Sincerely,

BENJAMIN MOORE & C O.



R. P. Bodson
Vice President - Finance

Monday, April 4, 1983

RPB:new

Guarantee made this April 4, 1983, by Benjamin Moore & Co., a business corporation organized under the laws of the state of New Jersey, herein referred to as guarantor, to the United States Environmental Protection Agency (EPA), obligee, on behalf of our subsidiary operator of Technical Coatings Co., 57 East Centre Street, Nutley, New Jersey 07110.

Recitals

1. Guarantor meets or exceeds the financial test criteria and agrees to comply with the reporting requirements for guarantors as specified in 40 CFR 264.143(f), 264.145(f), 265.143(e), and 265.145(e).

2. Technical Coatings Co, operates the following hazardous waste management facility covered by this guarantee: NJDO-41511254
Technical Coatings Co.
57 East Centre Street
Nutley, NJ 07110

Closure Cost Estimate \$3,840.00

3. "Closure plans" and "post-closure plans" as used below refer to the plans maintained as required by Subpart G of 40 CFR Parts 264 and 265 for the closure and post closure care of facilities as identified above.

4. For value received from operator, guarantor guarantees to EPA that in the event that operator fails to perform closure of the above facility in accordance with the closure plans and other permit or interim status requirements whenever required to do so, the guarantor shall do so or establish a trust fund as specified in Subpart H of 40 CFR Parts 264 or 265, as applicable, in the name of operator in the amount of the current closure or post-closure cost estimates as specified in Subpart H of 40 CFR Parts 264 and 265.

5. Guarantor agrees that if, at the end of any fiscal year before termination of this guarantee, the guarantor fails to meet the financial test criteria, guarantor shall send within 90 days, by certified mail, notice to the EPA Regional Administrator for the Region in which the facility is located and to operator that he intends to provide alternate financial assurance as specified in Subpart H of 40 CFR Parts 264 or 265, as applicable, in the name of operator.

Within 120 days after the end of such fiscal year, the guarantor shall establish such financial assurance unless operator has done so.

6. The guarantor agrees to notify the EPA Regional Administrator by certified mail, of a voluntary or involuntary proceeding under Title 11 (Bankruptcy), U.S. Code, naming guarantor as debtor, within 10 days after commencement of the proceeding.

7. Guarantor agrees that within 30 days after being notified by an EPA Regional Administrator of a determination that guarantor no longer meets the financial test criteria or that he is disallowed from continuing as a guarantor of closure or post-closure care, he shall establish alternate financial assurance as specified in Subpart H of 40 CFR Parts 264 or 265, as applicable, in the name of operator unless operator has done so.

8. Guarantor agrees to remain bound under this guarantee notwithstanding any or all of the following: amendment or modification of the closure or post-closure plan, amendment or modification of the permit, the extension or reduction of the time of performance of closure or post-closure, or any other modification or alteration of an obligation of the owner or operator pursuant to 40 CFR Parts 264 or 265.

9. Guarantor agrees to remain bound under this guarantee for so long as operator must comply with the applicable financial assurance requirements of Subpart H of 40 CFR Parts 264 and 265 for the above listed facilities, except that guarantor may cancel this guarantee by sending notice by certified mail to the EPA Regional Administrator for the Region in which the facility is located and to operator such cancellation to become effective no earlier than 120 days after receipt of such notice by both EPA and operator, as evidenced by the return receipts.

10. Guarantor agrees that if operator fails to provide alternate financial assurance as specified in Subpart H of 40 CFR Parts 264 or 265, as applicable and obtain written approval of such assurance from the EPA Regional Administrator within 90 days after a notice of cancellation by the guarantor is received by an EPA Regional Administrator from guarantor, guarantor shall provide such alternate financial assurance in the name of operator.

11. Guarantor expressly waives notice of acceptance of this guarantee by the EPA or by operator. Guarantor also

expressly waives notice of amendments or modifications of the closure and/or post-closure plan and of amendments of modifications of the facility permit.

I hereby certify that the wording of this guarantee is identical to the wording specified in 40 CFR 264.151(h) as such regulations were constituted on the date regulations were constituted on the date first above written.

April 4, 1983

Benjamin Moore & Co.



R. P. Bodson
Vice President-Finance

13 DEC 1982

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE:

Benjamin Moore (Newark, NJ)

SUBJECT: NJD002456242

William K. Sawyer, Attorney *WKS*

FROM: General Enforcement Branch

File

TO:

On December 7, 1982, Mike Nalbone of NJDEP called me. He had recently inspected this facility at my request, and he found a greatly improved situation. He had continuing questions in two areas:

- (1) A manual pump. He was going to investigate this.
- (2) Discharges from two discharge lines-In 1981 Al Ianuzzi of NJDEP had found the discharge had a "high reading for flash" (low ignitability). Mike Nalbone took 2 samples during his most recent inspection, but we agreed to send an inquiry to the company before a decision was made on whether to incur the time and expense associated with sample analysis. Mike agreed to send me a copy of his inspection report on a fasttrack basis

Because of the staleness of the 3/15/82 inspection and the company's apparent compliance now, issuance of a RCRA complaint at this time does not appear to be an effective use of agency resources.

cc: ✓ Tom Taccone, 2 PM-PA
Bruce Adler, 2 ENF-GE

HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

1. National Union Fire Insurance Company of Pittsburgh, Pa.,
"Insurer" of 70 Pine Street, New York, N.Y. hereby certifies
that it has issued liability insurance covering bodily
injury and property damage to Benjamin Moore & Company of 51
Chestnut Ridge Road, Montvale, New Jersey in connection with
the insured's obligation to demonstrate financial
responsibility under 40CFR 264.147 or 265.147. The coverage
applies at NJDO-02456242, Benjamin Moore & Company, 134
Lester Avenue, Newark, New Jersey and NJD041511254,
Technical Coatings Company, 57 East Centre Street, Nutley,
New Jersey. for "sudden accidental occurrences". The limits
of liability are \$1,000,000 each occurrence for Bodily
Injury and \$1,000,000 each occurrence/\$2,000,000 aggregate
for Property Damage, excess of \$500,000 each occurrence for
Bodily Injury and \$100,000 each occurrence/\$100,000
aggregate for Property Damage exclusive of legal defense
costs. The coverage is provided under policy number
BE1338667, issued on 9/30/82. The effective date of said
policy is 9/30/82.
2. The Insurer further certifies the following with respect to
the insurance described in Paragraph 1:
 - A. Bankruptcy or insolvency of the insured shall not
relieve the Insurer of its obligations under the policy.

JUN 10 1982

B. The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147 (f) or 265.147 (f).

C. Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.

D. Cancellation of the insurance, whether by the insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

3. Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

I hereby certify that the working of this instrument is identical to the wording specified in 40CFR 264.151(j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

(Signature of authorized representative of Insurer) _____

(Type Name) ~~William Litwin Casualty Underwriter~~ _____

(Title), Authorized Representative of National Union Fire
Insurance Company of Pittsburgh, Pa.

William Litwin

(Address of Representative) 99 JOHN ST. NEW YORK, N.Y. 10038

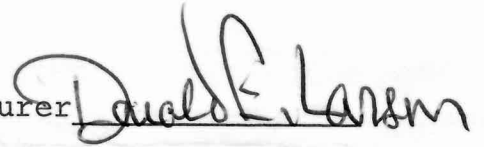
HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

1. American National Fire Insurance Company, "Insurer" of 14 Ridgedale Avenue, Cedar Knolls, New Jersey hereby certifies that it has issued liability insurance covering bodily injury and property damage to Benjamin Moore & Company of 51 Chestnut Ridge Road, Montvale, New Jersey in connection with the insured's obligation to demonstrate financial responsibility under 40CFR 264.147 or 265.147. The coverage applies at NJDO-02456242, Benjamin Moore & Company, 134 Lister Avenue, Newark, New Jersey and NJD041511254, Technical Coatings Company, 57 East Centre Street, Nutley, New Jersey. for "sudden accidental occurrences". The limits of liability are \$500,000 each occurrence for Bodily Injury and \$100,000 each occurrence/\$100,000 aggregate for Property Damage, exclusive of legal defense costs. The coverage is provided under policy number SLP9441350, issued on 9/30/82. The effective date of said policy is 9/30/82.
2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:
 - A. Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.

- B. The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147 (f) or 265.147 (f).
- C. Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.
- D. Cancellation of the insurance, whether by the insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.
3. Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

I hereby certify that the working of this instrument is identical to the wording specified in 40CFR 264.151(j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

(Signature of authorized representative of Insurer)



(Type Name) Donald Larson

(Title), Authorized Representative of American National Fire
Insurance Company Commercial Lines Manager

(Address of Representative) 14 Ridgedale Avenue, Cedar Knolls, N.J.

EX-100-1000000
1000 1000 1000 1000
1000 1000 1000 1000



Benjamin Moore & Co.

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BOSTON
RICHMOND
JACKSONVILLE

CHICAGO
ST. LOUIS
CLEVELAND
HOUSTON

DENVER
LOS ANGELES
SANTA CLARA
TORONTO
MONTREAL
VANCOUVER

CHESTNUT RIDGE ROAD

MONTVALE, NEW JERSEY 07645

EXECUTIVE OFFICE

July 6, 1982

Regional Administrator
Attn: RCRA Financial Requirements
Grants Administration Branch
26 Federal Plaza
New York, New York 10007

OFFICE OF THE ATTORNEY GENERAL
NEW YORK, NEW YORK 10007
AUG 4 3 59 PM '82
ENVIRONMENTAL PROTECTION
AGENCY
NEW YORK, NEW YORK 10007

Re: Letter from Chief Financial Officer (to demonstrate liability coverage or to demonstrate both liability coverage and assurance of closure or post-closure care)

Dear Sir/Madam:

I am the Chief Financial Officer of Benjamin Moore & Co., 51 Chestnut Ridge Road, Montvale, NJ 07645. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265.

MADO-01065911
Benjamin Moore & Co.
49 Sumner Street
Milford, MA 01757

ILDO-05457155
Benjamin Moore & Co.
North and 25th Avenues
Melrose Park, IL 60160

FLDO-04061099
Benjamin Moore & Co.
1436 E. Adams Street
Jacksonville, FL 32202

OHDO-04219929
Benjamin Moore & Co.
4400 East 71st Street
Cleveland, OH 44105

NJDO-02456242
Benjamin Moore & Co.
134 Lister Avenue
Newark, NJ 07105

TXDO-08095853
Benjamin Moore & Co.
1300 National Street
Houston, TX 77007

VADO-42197772
Benjamin Moore & Co.
West Roslyn Road
Colonial Heights, VA 23834

MOD0-06290258
Benjamin Moore & Co.
1630 S. Second Street
St. Louis, MO 63157

June 24, 1982

CODO-07068372

Benjamin Moore & Co.
2500 Walnut Street
Denver, CO 80205

CADO-08314932

Benjamin Moore & Co.
3325 S. Garfield Avenue
Los Angeles, CA 90040

ILDO-59430561

Technical Coatings Co.
North & 25th Avenues
Melrose Park, IL 60160

NJDO-41511254

Technical Coatings Co.
57 East Centre Street
Nutley, NJ 07110

CADO-09118506

Technical Coatings Co.
1056 Walsh Avenue
Santa Clara, CA 95050

TXDO-07516677

Dal-Worth Paint Mfg. Co.
733 Dal-Worth Drive
Mesquite, TX 75149

Request for ID #

Filed - 2 wks. ago

(Not yet received)

Academy Paint Co. Inc.

P.O. Box 0006

United States Avenue

Gibbsboro, NJ 08026

1. The owner or operator identified above owns or operates the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H or 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

MADO-01065911

Benjamin Moore & Co.
49 Sumner Street
Milford, MA 01757

Closure Cost Estimate \$6,900

Post Closure Care Cost
Estimate Not Applicable

FLDO-04-61099

Benjamin Moore & Co.
1436 E. Adams Street
Jacksonville, FL 32202

Closure Cost Estimate \$4,414

Post-Closure Care Cost
Estimate Not Applicable

NJDO-02456242

Benjamin Moore & Co.
134 Lister Avenue
Newark, NJ 07105

Closure Cost Estimate \$29,900

Post-Closure Care Cost
Estimate Not Applicable

VADO-42197772

Benjamin Moore & Co.
West Roslyn Road
Colonial Heights, VA 23834

Closure Cost Estimate \$10,000

Post-Closure Care Cost
Estimate Not Applicable

ILDO-05457155

Benjamin Moore & Co.
North and 25th Avenues
Melrose Park, IL 60160

Closure Cost Estimate \$3,000

Post-Closure Care Cost
Estimate Not Applicable

OHDO-04219929
Benjamin Moore & Co.
4400 East 71st Street
Cleveland, OH 44105

Closure Cost Estimate \$5,000
Post-Closure Care Cost
Estimate Not Applicable

TXDO-08095853
Benjamin Moore & Co.
1300 National Street
Houston, TX 77007

Closure Cost Estimate \$2,300
Post-Closure Care Cost
Estimate Not Applicable

MOD0-06290258
Benjamin Moore & Co.
1630 S. Second Street
St. Louis, MO 63157

Closure Cost Estimate \$5,000
Post-Closure Care Cost
Estimate Not Applicable

CODO-07068372
Benjamin Moore & Co.
2500 Walnut Street
Denver, CO 80205

Closure Cost Estimate \$4,723
Post-Closure Care Cost
Estimate Not Applicable

CADO-08314932
Benjamin Moore & Co.
3325 S. Garfield Avenue
Los Angeles, CA 90040

Closure Cost Estimate \$9,352
Post-Closure Care Cost
Estimate Not Applicable

2. The owner or operator identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure and post-closure care of the following facilities owned and operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility:

ILDO-59430561
Technical Coatings Co.
North & 25th Avenues
Melrose Park, IL 60160

Closure Cost Estimate \$3,400
Post-Closure Care Cost
Estimate Not Applicable

NJDO-41511254
Technical Coatings Co.
57 East Centre Street
Nutley, NJ 07110

Closure Cost Estimate \$3,840
Post-Closure Care Cost
Estimate Not Applicable

CADO-09118506
Technical Coatings Co.
1056 Walsh Avenue
Santa Clara, CA 95050

Closure Cost Estimate \$4,500
Post-Closure Care Cost
Estimate Not Applicable

TXDO-07516677
Dal-Worth Paint Mfg. Co.
733 Dal-Worth Drive
Mesquite, TX 75149

Closure Cost Estimate \$1,680
Post-Closure Care Cost
Estimate Not Applicable

FILED - 2 WKS.AGO-Number Pending
Academy Paint Co. Inc.
P.O. Box 0006
United States Avenue
Gibbsboro, NJ 08026

Closure Cost Estimate \$1,680
Post-Closure Care Cost
Estimate Not Applicable

3. In states where EPA is not administering the financial requirements of Subpart H or 40 CFR Parts 264 and 265, this owner or operator is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test are shown for each facility: None.

4. The owner or operator identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a state through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent state mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: None.

The owner or operator is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on December 31. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year ended December 31, 1981.

ALTERNATIVE I

1.	Sum of current closure and post-closure cost estimates (total of <u>all</u> cost estimates listed above)	95,689
2.	Amount of annual aggregate liability coverage to be demonstrated	2,000,000
3.	Sum of lines 1 and 2	2,095,689
*4.	Total liabilities	19,810,404
*5.	Tangible net worth	73,003,356
*6.	Net Worth	73,318,795
*7.	Current assets	73,450,126
*8.	Current liabilities	15,697,830
9.	Net working capital	57,752,296
*10.	The sum of net income plus depreciation, depletion and amortization	12,783,345

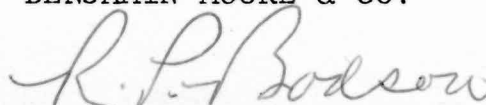
*11.	Total assets in the U.S. (required only if less than 90 % of assets are located in the U.S.)	79,890,351	
		<u>YES</u>	<u>NO</u>
12.	Is line 5 at least \$10 Million?	X	
13.	Is line 5 at least 6 times line 3?	X	
14.	Is line 9 at least 6 times line 3?	X	
*15.	Are at least 90% of assets located in the U.S.? If not, complete line 16		X
16.	Is line 11 at least 6 times line 3?	X	
17.	Is line 4 divided by line 6 less than 2.0?	X	
18.	Is line 10 divided by line 4 greater than 0.1?	X	
19.	Is line 7 divided by line 8 greater than 1.5?	X	

* Covered by accountants report, all others not covered.

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151 (g) as such regulations were constituted on the date shown immediately below.

Very truly yours,

BENJAMIN MOORE & CO.



R.P. Bodson
Vice President-Finance

RPB:new

GRANTS ADMINISTRATION
BRANCH
REGION II

AUG 4 3 59 PM '82

ENVIRONMENTAL PROTECTION
AGENCY
NEW YORK, NEW YORK 10007

411 Hackensack Avenue
Hackensack, New Jersey 07601
(201) 342-9300
Cable DEHANDS

Benjamin Moore & Co.
51 Chestnut Ridge Road
Montvale, New Jersey 07645

June 24, 1982

Dear Sirs:

We have examined the balance sheet of Benjamin Moore & Co. and consolidated subsidiaries as of December 31, 1981 and the related statements of income, shareholders' equity, and changes in financial position for the year then ended and have issued our report thereon dated February 26, 1982. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances. We have not performed any auditing procedures beyond the date of our opinion on the consolidated financial statements; accordingly, this report is based on our knowledge as of that date and should be read with that understanding.

At your request, we have performed the procedures enumerated below with respect to the accompanying letter from Mr. R. Paul Bodson to the Regional Administrator - U.S. Environmental Protection Agency dated June 24, 1982. It is understood that this report is solely for filing with the U.S. Environmental Protection Agency in accordance with requirements of the Resource Conservation and Recovery Act, and is not to be used for any other purpose. The procedures that we performed are summarized as follows:

1. We compared the amounts included in items 6, 7 and 8 under the caption Alternative I in the letter referred to above with the corresponding amounts in the consolidated financial statements referred to in the first paragraph.

2. We recomputed from, or reconciled to, the consolidated financial statements referred to in the first paragraph the information included in items 4, 5, 10, 11 and 15 under the caption Alternative I in the letter referred to above.

Because the procedures referred to in the preceding paragraph were not sufficient to constitute an examination made in accordance with generally accepted auditing standards, we do not express an opinion on any of the information or amounts listed under the caption Alternative I in the aforementioned letter. In performing the procedures referred to above, however, no matters came to our attention that caused us to believe that the information or amounts included in items 4, 5, 6, 7, 8, 10, 11 and 15 should be adjusted.

Yours truly,

Deloitte Haskins & Sells

NJD 002456242

②



Benjamin Moore & Co.

PAINTS • VARNISHES • ENAMELS

1980 AUG 14 PM 4:50

MONTVALE
NEW YORK
NEWARK
BOSTON
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CLEVELAND
HOUSTON

DENVER
LOS ANGELES
SANTA CLARA
TORONTO
MONTREAL
VANCOUVER

134 LISTER AVENUE

NEWARK, NEW JERSEY 07105

CENTRAL LABORATORIES

August 11, 1980

U. S. - EPA
P. O. Box 9655
Rosslyn Station
Arlington, Virginia 22209

Gentlemen:

Please send me two (2) Part A application packets for RCRA Interim Status. Two of our plants, in Newark N. J. and Santa Clara, California never received the original EPA packets and do not have I.D. numbers assigned to them yet. When they do receive their I.D. numbers, I will use them on the permit applications I am requesting from you now.

Thank you.

Very truly yours,

BENJAMIN MOORE & CO.

Leo Chaison

Leo Chaison
Manager - Regulatory Affairs

LC:ch

2 PERMIT

245
SENT
8/15/80

SEP 2 2 19 PM '80
ENVIRONMENTAL PROTECTION
AGENCY
NEW YORK, N.Y. 10007



Benjamin Moore & Co.

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LOS ANGELES
SANTA CLARA
TORONTO
MONTREAL
VANCOUVER

134 LISTER AVENUE

NEWARK, NEW JERSEY 07105

CENTRAL LABORATORIES

July 25, 1980

EPA Region II
Information Service Center
26 Federal Plaza
New York, N. Y. 10007

Gentlemen:

I am enclosing our Notification of Hazards Waste Activity. Please issue me the appropriate EPA identification number.

Thank you.

Very truly yours,

BENJAMIN MOORE & CO.

John N. Caruso
Plant Superintendent

JNC:ch

U. S. ENVIRONMENTAL PROTECTION AGENCY
Region II
26 Federal Plaza, New York, NY 10278

NOTICE OF DEFICIENCY
in compliance with
HAZARDOUS WASTE FACILITY STANDARDS

The checked items below refer to Subparts of Title 40, Code of Federal Regulations, Protection of the Environment. Service of this Notice does not preclude the use of other means of informing the addressee of the same or additional violations.

Federal Law requires that this Notice be answered in writing, confirming that the cited violations have been corrected, within 30 days from the date of this Notice for Part 262 violations and within 60 days for Part 265 violations.

ADDRESSEE NAME:

FACILITY ID NO.:

FACILITY LOCATION:

FACILITY CONTACT:
(Print name & title)

INSPECTOR:

INSPECTION DATE:

VIOLATIONS CITED:

Part 262--Generator Standards

- ☐ 262.11 Determination of Hazardousness
- ☐ 262.21 Incomplete Manifest
- ☐ 262.30 Wastes improperly packaged
- ☐ 262.31 Labels do not meet DOT regs
- ☐ 262.32(a) Improper DOT package marks
- ☐ 262.32(b) Improper DOT container marks
- ☐ 262.34(a)(2) Mark start of accumulation
- ☐ 262.34(a)(3) No "Hazardous Waste" label
- ☐ 262.34(b) >90 day accum w/o compliance
- ☐ 262.40 Manifest records insufficient
- ☐ 262.42 Exception Reports not submitted

Part 265--Treatment, Storage and Disposal
Facility Standards

- ☐ 265.13(b) Waste Analysis Plan missing
- ☐ 265.14 Site security deficient
- ☐ 265.14(c) "Danger" sign missing
- ☐ 265.15 Operator inspection records missing or deficient
- ☐ 265.16(d) Personnel, jobs, training records missing or deficient
- ☐ 265.17 Ignitable and reactive wastes unprotected from sources of ig & reac
- ☐ 265.32 Fire & spill control & decontamination equipment inaccessible, missing, or deficient.
- ☐ 265.51 Contingency Plan insufficient

Part 265--Treatment, Storage and
Disposal Facility Standards,
continued

- ☐ 265.32(a) Communications or alarm system missing or deficient.
- ☐ 265.34 Access to alarm or communication deficient
- ☐ 265.35 Aisle space insufficient
- ☐ 265.53 Distribution of Contingency Plan to police & fire depts., etc
- ☐ 265.55 Lack of emergency coordinator
- ☐ 265.73 Operating record--type, quantity, location of wastes--not sufficient
- ☐ 265.112 Closure Plan insufficient
- ☐ 265.118 Post-Closure Plan insufficient
- ☐ 265.142 Estimate of costs of closure
- ☐ 265.171 Leaking container COUNT
- ☐ 265.173(a) Open container COUNT
- ☐ 265.173(b) Minimize risk of leak or rupture COUNT
- ☐ 265.174 Inspect container storage weekly
- ☐ 265.176 Containers holding ignitable or reactive waste closer than 50 feet from property line COUNT

I HEREBY ACKNOWLEDGE RECEIPT:

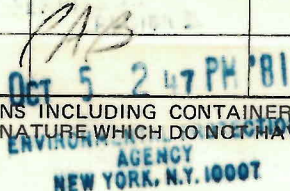


Signature of Facility Contact

See cover sheet for instructions.
Please TYPE all information.

STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION
HAZARDOUS WASTE MANIFEST

PART A: SEND TO DISPOSER'S STATE

DOCUMENT NO. NJ 0031136

GENERATOR NAME Benjamin Moore & Company		PHONE (INCLUDE AREA CODE) 201-344-1200		EPA ID NO. NJ 002456242	
ADDRESS (STREET - CITY - STATE - ZIP CODE) 134 Lister Avenue, Newark, New Jersey 07105					
TRANSPORTER NO. 1 Delaware Container Co. Inc.		PHONE (INCLUDE AREA CODE) 215-383-4550		EPA ID NO. PA 064375470	
ADDRESS (STREET - CITY - STATE - ZIP CODE) West 11th Avenue, Valley Road, Coatesville, Pennsylvania					
TRANSPORTER NO. 2		PHONE (INCLUDE AREA CODE)		EPA ID NO.	
ADDRESS (STREET - CITY - STATE - ZIP CODE)					
TREATMENT, STORAGE OR DISPOSAL (TSD) FACILITY Norlite		PHONE (INCLUDE AREA CODE) 518-235-0401		EPA ID NO. NY 080469935	
SITE ADDRESS (STREET - CITY - STATE - ZIP CODE) 628 South Saratoga Street, Cohes, New York					
IF MORE THAN TWO TRANSPORTERS ARE TO BE UTILIZED, FILL OUT THE FOLLOWING AS APPROPRIATE THIS FORM IS NO. _____ OF A TOTAL OF _____. THE FIRST MANIFEST DOCUMENT NO. IS NJ → _____					
PROPER US DOT SHIPPING NAME	US DOT HAZARD CLASS	UN NUMBER	FORM	NET QUANTITY	CONTAINERS NO. TYPE
1. Solvent Residue	Flammable Liquid NOS	UN1993	1	5000	1 02
2.					
3.					
4.					
5.					
6.					
SPECIAL HANDLING INSTRUCTIONS INCLUDING CONTAINER EXEMPTION (i.e. IDENTIFICATION OF ADDITIONAL WASTES INCLUDED IN SHIPMENT OF A NONHAZARDOUS NATURE WHICH DO NOT HAVE TO BE MANIFESTED) 					
GENERATOR'S CERTIFICATION: This is to certify that the above named materials are properly classified, described, marked and labelled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, U.S. EPA and the State. The wastes described above were consigned to the Transporter named. The Treatment, Storage or Disposal Facility can and will accept the shipment of hazardous waste, and has a valid permit to do so. I certify that the foregoing is true and correct to the best of my knowledge.					
GENERATOR'S SIGNATURE 		TITLE Supervisor		DATE SHIPPED 09 30 81 MO. DAY YR.	
TRANSPORTER NO. 1 SIGNATURE AND CERTIFICATION OF RECEIPT OF SHIPMENT 		TRANSPORTER NO. 1 VEHICLE ID NO. 4007 BA		EXPECTED ARRIVAL DATE 09 30 81 MO. DAY YR.	
				DATE RECEIVED 09 30 81 MO. DAY YR.	

TO BE TYPED IN BY GENERATOR